

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR DIRECT PURCHASER)	
ANTITRUST LITIGATION)	C.A. No. 05-340 (KAJ)
)	
THIS DOCUMENT RELATES TO:)	(consolidated)
)	
C.A. No. 05- 358 (KAJ))	
)	

**NOTICE OF VIDEOTAPE DEPOSITION OF WALGREEN CO. PURSUANT
TO FED.R.CIV.P. 30(B)(6), LIMITED TO CLASS CERTIFICATION ISSUES**

To: All Counsel on the Attached Service List

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for Defendants shall take the deposition by oral examination of plaintiff Walgreen Co. ("Walgreen"), on June 9, 2006 at 9:30 A.M., at the offices of Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, NY, or such other location agreed to by counsel. The deposition will be recorded by videotape as well as stenographically before a Notary Public or other officer authorized to administer oaths, and shall continue from day to day until completed, with such adjournments as to time and place as may be necessary.

NOTICE IS HEREBY GIVEN that pursuant to Fed. R. Civ. P. 30(b)(6), Walgreen is required to designate one or more appropriate persons to testify on its behalf with respect to each of the matters set forth in Exhibit A hereto, and the person(s) so designated shall be required to testify as to each of those matters known or reasonably available to the corporation. You are invited to attend and cross-examine. Walgreen must also produce documents with respect to each of the matters set forth in Exhibit B hereto by June 7, 2006. Nothing in this notice shall be

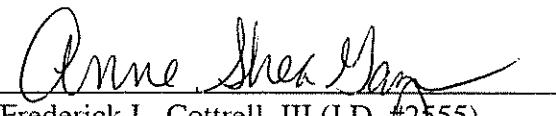
construed in any way to prejudice Defendants from conducting further 30(b)(6) depositions on non-class certification issues.

Of Counsel:

Steven C. Sunshine
Maria M. DiMoscato
CADWALADER, WICKERSHAM & TAFT LLP
1201 F Street, N.W.
Washington, D.C. 20004
(202) 862-2200

Matthew P. Hendrickson
Bradley J. Demuth
CADWALADER, WICKERSHAM & TAFT LLP
One World Financial Center
New York, NY 10281
(212) 504-6000

Timothy C. Bickham
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036-1795
(202) 429-5517


Frederick L. Cottrell, III (I.D. #2555)
Anne Shea Gaza (I.D. #4093)
cottrell@rlf.com
gaza@rlf.com
RICHARDS, LAYTON & FINGER
One Rodney Square
P.O. Box 551
Wilmington, DE 19801
(302) 651-7700

Attorneys for Defendants Fournier
Industrie et Sante and Laboratories
Fournier, S.A.

Dated: May 22, 2006

DEFINITIONS AND INSTRUCTIONS

The use of any definition for purposes of this Notice shall not be deemed to constitute an agreement or acknowledgement on the part of defendant that such definition is accurate, meaningful or appropriate for any other purpose in this action.

The terms "Your" or "Your" means Walgreen Co.; all parents, subsidiaries, and affiliates thereof, all divisions, predecessors, successors and assigns of each of the foregoing; and all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, each of the foregoing.

"Impax" means counterclaim plaintiff Impax Laboratories, Inc., all parents, subsidiaries, and affiliates thereof, all divisions, predecessors, successors and assigns of each of the foregoing; and all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, each of the foregoing.

The term "TriCor®" means any pharmaceutical product marketed under the trade name "TriCor®," at any time.

The term "Lofibra®" means any pharmaceutical product marketed under the trade name "Lofibra®," at any time.

The term "Antara®" means any pharmaceutical product marketed under the trade name "Antara®," at any time.

The term "Triglide®" means any pharmaceutical product marketed under the trade name "Triglide®," at any time.

The term "Lipofen®" means any pharmaceutical product marketed under the trade name "Lipofen®" at any time

The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document within the meaning of this term.

The term "concerning" means discussing, relating to, referring to, describing, evidencing or constituting.

The use of the singular of any word shall include the plural and vice versa, and the use of a verb in any tense or voice shall be construed as the use of that verb in all other tenses and voices, as necessary to bring within the scope of the discovery request all responses that might otherwise be construed as outside its scope.

The relevant time frame for these topics is January 1998 to the present.

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2006, I caused to be served by hand delivery the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

Josy W. Ingersoll
 John W. Shaw
 Karen Keller
 Young Conaway Stargatt & Taylor, LLP
 The Brandywine Building
 1000 West Street, 17th Floor
 P.O. Box 391
 Wilmington, Delaware 19899-0391

Jeffrey S. Goddess
 Rosenthal, Monhait, Gross & Goddess, P.A.
 919 Market Street, Suite 1401
 P.O. Box 1070
 Wilmington, DE 19899-1070
 Tel. (302) 656-4433
 Fax. (302) 658-7567

Jonathan L. Parshall
 Murphy Spadaro & Landon
 1011 Centre Road, Suite 210
 Wilmington, DE 19801

Michael I. Silverman
 Lynn A. Iannone
 Silverman & McDonald
 1010 North Bancroft Parkway
 Suite 22
 Wilmington, DE 19805

Mary B. Graham
 Morris Nichols, Arsh & Tunnell
 1201 North Market Street
 P.O. Box 1347
 Wilmington, DE 19899

Mary B. Matterer
 Morris, James, Hitchens & Williams
 222 Delaware Avenue, 10th Floor
 Wilmington, DE 19801

Pamela S. Tikellis
 Robert J. Kriner, Jr.
 A. Zachary Naylor
 Chimicles & Tikellis LLP
 One Rodney Square
 P.O. Box 1035
 Wilmington, DE 19899

Elizabeth M. McGeever
 Prickett Jones Elliott, P.A.
 1310 King Street
 Wilmington, DE 19801

Patrick Francis Morris
 Morris & Morris LLC
 4001 Kennett Pike, Suite 300
 Wilmington, Delaware 19807

I hereby certify that on May 22, 2006, I sent by electronic mail the foregoing document to the following non-registered participants:

REPRESENTING DIRECT PARTY PLAINTIFFS
 (C.A. 05-340):

Jeffrey S. Goddess
jgoddess@rmgglaw.com

Bruce E. Gerstein
bgerstein@garwingerstein.com

Barry S. Taus
btaus@garwingerstein.com

Adam M. Steinfeld
asteinfeld@garwingerstein.com

Daniel Berger
danberger@bm.net

Eric L. Cramer
ecramer@bm.net

Peter Kohn
pkohn@bm.net

Linda P. Nussbaum
lnussbaum@cmht.com

Steig D. Olson
solson@cmht.com

Elizabeth M. McGeever
emmcgeever@prickett.com

Scott E. Perwin
sperwin@kennynachwalter.com

Joseph T. Lukens
jlukens@hangley.com

Jonathan L. Parshall
jonp@msllaw.com

William Christopher Carmody
bcarmody@susmangodfrey.com

John Turner:
jturner@susmangodfrey.com

Shawn Rabin:
srabin@susmangodfrey.com

Justin Nelson:
jnelson@susmangodfrey.com

Cindy Tijerina:
ctijerina@susmangodfrey.com

REPRESENTING WALGREEN, ECKERD, KROGER,
MAXI, CVS, RITE AID
(C.A. 05-340):

REPRESENTING PACIFICARE
(C.A. 05-340):

Ken Zylstra:
kzylstra@sbcclasslaw.com

Lyle Stamps:
lstamps@sbcclasslaw.com

Steve Connolly
Sconnolly@abclasslaw.com

Mark Sandman:
mms@rawlingsandassociates.com

Jeffrey Swann:
js5@rawlingsandassociates.com

REPRESENTING INDIRECT PARTY PLAINTIFFS
(C.A. 05-360):

Pamela S. Tikellis
Thomas M. Sobol
Patrick E. Cafferty
Jeffrey L. Kodroff
Bernard J. Persky
William C. Carmody
Mike Gottsch
Zach Naylor
Robert Davis
Brian Clobes
Michael Tarringer
Tim Fraser
David Nalven
Greg Matthews
Christopher McDonald
Kellie Safar
Ted Lieverman
Pat Howard

Tricor@chimicles.com

REPRESENTING IMPAX LABORATORIES
(C.A. 03-120):

Mary Matterer
mmatterer@morrisjames.com

John C. Vetter
jvetter@kenyon.com

Asim Bhansali
abhangali@kvn.com

REPRESENTING TEVA PHARMACEUTICALS
(C.A. 02-1512):

Josy W. Ingersoll
Bruce M. Gagala
Karen E. Keller
Christopher T. Holding
Ken Cohen
Elaine Blais

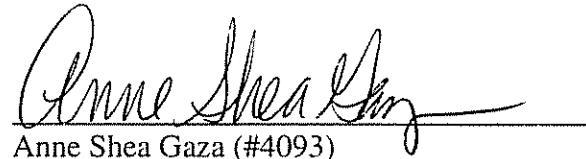
tricor@yest.com

REPRESENTING ABBOTT (ALL CASES):

Mary B. Graham
Tricor@mnat.com

William F. Cavanaugh
wfcavanaugh@pbwt.com

Chad J. Peterman
cjpeterman@pbwt.com



Anne Shea Gaza (#4093)
GAZA@rlf.com